

CDF LABOR LAW LLP  
Dawn M. Irizarry, State Bar No. 223303  
dirizarry@cdflaborlaw.com  
Nicole A. Legrottaglie, State Bar No. 271416  
nlegrottaglie@cdflaborlaw.com  
707 Wilshire Boulevard, Suite 5150  
Los Angeles, CA 90017  
Telephone: (213) 612-6300  
  
Attorneys for Defendant  
Delta Air Lines, Inc.

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CYNTHIA SPEED,  
  
Plaintiff,  
  
vs.

DELTA AIR LINES, INC., a Delaware  
Corporation; and DOES 1 through 50  
Inclusive,  
  
Defendant.

) Case No. 2:24-cv-8687 TJH (MARx)  
)  
) (Removed From Los Angeles Superior  
) Court Case No. 24TRCV02879)  
)  
) Assigned for All Purposes To:  
) Judge: Hon. Terry J. Hatter Jr.  
) Ctrm: 9C  
)  
) **NOTICE OF MOTION AND**  
) **DEFENDANT DELTA AIR LINES**  
) **INC.'S MOTION FOR RULE 11**  
) **SANCTIONS**  
)  
) Date: June 2, 2025  
) Time: No Appearance Necessary  
) Ctrm: 9C  
)

**TO PLAINTIFF CYNTHIA SPEED AND PLAINTIFF’S ATTORNEYS  
OF RECORD:**

**PLEASE TAKE NOTICE** that on June 2, 2025, or as soon thereafter as this matter may be heard in Courtroom 9C of the above-entitled Court located at 350 W. 1<sup>st</sup> Street, 9<sup>th</sup> Floor, Los Angeles, CA 90012, Defendant DELTA AIR LINES, INC. (“Delta” or “Defendant”), by and through its attorneys of record, will and hereby submits this Motion for Sanctions against Plaintiff CYNTHIA SPEED (“Plaintiff”) and Plaintiff’s Counsel pursuant to FRCP Rule 11(b).

This Motion is based on the grounds that the arguments raised in Plaintiff’s Motion to Remand are frivolous and unsupported by case law regarding diversity jurisdiction under 28 U.S.C. § 1332(a). Sanctions are warranted because Plaintiff had no legal basis for seeking remand. As a result, the Court should sanction Plaintiff and her counsel in a manner that will deter from future violations of Rule 11.

This Motion is based upon this Notice of Motion and Motion, the accompanying Memorandum of Points and Authorities, the Declaration of Nicole A. Legrotaglie, and exhibits thereto, all pleadings and papers filed herein, records of the Court, matters upon which the Court may or shall take judicial notice, and upon such oral and documentary evidence that may be properly presented by the parties at the hearing on this Motion.

Dated: April 29, 2025

CDF LABOR LAW LLP

By: 

Nicole A. Legrotaglie  
Attorneys for Defendant  
Delta Air Lines, Inc.

**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF ORANGE.

I, the undersigned, declare that I am employed in the aforesaid County, State of California. I am over the age of 18 and not a party to the within action. My business address is 18300 Von Karman Avenue, Suite 800, Irvine, CA 92612. On April 29, 2025, I served upon the interested party(ies) in this action the following document described as: **NOTICE OF MOTION AND DEFENDANT DELTA AIR LINES INC.'S MOTION FOR RULE 11 SANCTIONS**

By the following method:

Phillip P. DeLuca, Esq.  
LAW OFFICES OF PHILLIP P. DeLUCA  
5820 E. Naples Plaza,  
Belmont Shore, CA 90803  
Tel: (562) 987-1300

E-MAIL: philippdeluca@gmail.com;  
cc: jrs@philipdeluca.com; dbd@philipdeluca.com;  
grl@philipdeluca.com

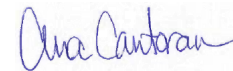
For processing by the following method:

☒ **(via FRCP)** Pursuant to FRCP Rule 5(b)(2)(E), I caused the documents to be sent to the persons at the electronic service addresses listed above pursuant to the parties' agreement to electronic service.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 29, 2025, at Irvine, California.

Ana Cantoran  
(Type or print name)



(Signature)